



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

GMP:MPR
F. #2009R01065

271 Cadman Plaza East
Brooklyn, New York 11201

September 14, 2018

By ECF

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Re: United States v. Joaquin Archivaldo Guzman Loera
Criminal Docket No. 09-466 (S-4) (BMC)

Dear Counsel:

The government's next production of supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure is enclosed. This production includes material that is marked "Protected Material" and is subject to the terms of the Court's April 3, 2017 Protective Order. See Dkt. No. 57. The government is also producing draft transcripts pursuant to the parties' September 12, 2017 signed stipulation. This discovery production supplements previous productions on February 14, 2017, March 8, 2017, April 10, 2017, May 5, 2017, June 7, 2017, July 21, 2017, August 11, 2017, September 19, 2017, October 17, 2017, November 7, 2017, November 21, 2017, January 19, 2018, February 12, 2018, March 19, 2018, April 16, 2018, May 18, 2018, May 25, 2018, June 05, 2018, June 25, 2018 and August 10, 2018. The government also requests reciprocal discovery from the defendant.

The Government's Discovery

000329182-000329183	Statements of the defendant (MCC Recordings)
000329184-000329237	Draft transcripts and translations of defendant's statements (MCC Recordings)
000329238-000329301	Lab report and photos related to a drug seizure ¹
000329447-000329448	Photos of defendant
000329449-000329483	Photos and documents related to a drug seizure ²

Pursuant to Federal Rule of Evidence 902, the government also is producing certified copies of the business records set forth below. The government previously produced these documents to you in discovery. This letter serves as notice under Rule 902(11) that the government intends to offer the business records at trial.

000329302-000329324	Certified ADM Records
000329325-000329345	Certified B&B Refractories Records
000329346-000329350	Certified Conrail Records
000329351-000329352	Certified New York & Atlantic Railroad Records
000329353-000329466	Certified Union Pacific Railroad Company

In addition, the government is producing final transcripts and translations of certain intercepted wire and electronics communications, including statements of the defendant. The final transcripts and translations are Bates-numbered 000329484-000329836.

¹ The government previously produced these photographs to the defendant as part of its September 5, 2018 production of 18 U.S.C. § 3500 material for law enforcement officers (see 3500-WOM-3 and 3500-YHTS-22).

² The government previously produced these documents to the defense on May 18, 2018 via email without Bates numbers. The government is reproducing the documents here with Bates numbers.

If you have specific questions about the government's discovery productions, please reach out to the prosecution team.

Very truly yours,

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cc: Clerk of the Court (BMC) (by ECF) (without enclosure)

Enclosure